

EXHIBIT A

From: Ariel Trajtenberg <arieltrajtenberg@quinnemanuel.com>
Sent: Wednesday, November 30, 2016 8:22 PM
To: deBettencourt, Justin D.; 'Simon Sandoval-Moshenberg'; Wookie Kim; Joy Odom
Cc: Dingman, Michael S.
Subject: RE: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.)

Justin,

Other than a vague reference to holiday travel, you have not explained why an extension is necessary. Given Judge Ellis' already generous briefing schedule, we cannot presently consent to an extension. If you would like us to reconsider, please provide us with the specific details about your team's conflicts that you intend to provide to Judge Ellis to justify your request.

Best,
Ariel

Ariel Wade Trajtenberg
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP
202-538-8163 Direct
arieltrajtenberg@quinnemanuel.com

From: deBettencourt, Justin D. [<mailto:JdeBettencourt@ReedSmith.com>]
Sent: Wednesday, November 30, 2016 5:26 PM
To: Ariel Trajtenberg <arieltrajtenberg@quinnemanuel.com>; 'Simon Sandoval-Moshenberg' <simon@justice4all.org>; Wookie Kim <wookiekim@quinnemanuel.com>; Joy Odom <joyodom@quinnemanuel.com>
Cc: Dingman, Michael S. <MDingman@ReedSmith.com>
Subject: RE: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.)

Hi Ariel:

Thank you for your email. We understand that Judge Ellis knew of the holidays; however, he did not know of counsel's holiday travel plans as we have represented. Are Plaintiffs prejudiced in any way by receiving Defendants' reply 3 days later – three weeks before the scheduled hearing?

Please let us know if this is Plaintiffs' final position before we seek the Court's intervention.

Thanks,
Justin

From: Ariel Trajtenberg [<mailto:arieltrajtenberg@quinnemanuel.com>]
Sent: Wednesday, November 30, 2016 4:41 PM
To: deBettencourt, Justin D.; 'Simon Sandoval-Moshenberg'; Wookie Kim; Joy Odom
Cc: Dingman, Michael S.
Subject: RE: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.)

Justin,

We consent to your proposal to move the pretrial conference and related deadlines to February 2.

We do not consent to your request for additional time to file your reply in support of summary judgment. Judge Ellis already set a reply date with an extra week to account for the holidays.

Best,
Ariel

Ariel Wade Trajtenberg
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP
202-538-8163 Direct
arieltrajtenberg@quinnemanuel.com

From: deBettencourt, Justin D. [<mailto:JdeBettencourt@ReedSmith.com>]
Sent: Wednesday, November 30, 2016 12:08 PM
To: Ariel Trajtenberg <arieltrajtenberg@quinnemanuel.com>; 'Simon Sandoval-Moshenberg' <simon@justice4all.org>; Wookie Kim <wookiekim@quinnemanuel.com>; Joy Odom <joyodom@quinnemanuel.com>
Cc: Dingman, Michael S. <MDingman@ReedSmith.com>
Subject: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.)

Hi Ariel:

In light of Judge Ellis' ruling yesterday, which modified the summary judgment briefing schedule, it seems that it would be in the interest of both parties to extend the final pretrial date and its associated deadlines (e.g., Rule 26 disclosures, witness list, exhibit list, exchange of exhibits and objections to the exhibit list). Please let us know if Plaintiffs consent to a request to move the final pretrial conference and its associated deadlines to Thursday February 2, 2016.

In addition, the schedule set by Judge Ellis for Defendants' Reply to Plaintiffs' Opposition to Motion for Summary Judgment overlaps with the Christmas and New Year's holidays. Due to the holidays and counsel's holiday travel schedule, please let us know if Plaintiffs consent to a request to move Defendants' Reply date from Tuesday January 3, 2016 to Friday January 6, 2016.

If there is consent, please let us know and we can circulate a draft motion for your review.

Thanks,
Justin

Justin deBettencourt
703.641.4209
jdebettencourt@reedsmith.com

Reed Smith LLP
7900 Tysons One Place
Suite 500
McLean, VA 22102
703.641.4200
Fax 703.641.4340

Please note our new address effective 3-21-16: 7900 Tysons One Place, Suite 500, McLean, VA 22102

* * *

This E-mail, along with any attachments, is considered confidential and may well be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your